

# Fishkin Lucks

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January 9, 2023

**Via ECF**

Honorable Mary Kay Vyskocil, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2230  
New York, NY 10007

USDC SDNY  
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Re: Altruis Group, LLC v. ProSight Specialty Management Co., Inc. et al.,  
1:21-cv-10757

Dear Judge Vyskocil:

We represent defendants ProSight Specialty Management Company, Inc. dba Coaction Specialty Management Company, Inc., New York Marine and General Insurance Company, and Gotham Insurance Company (collectively, "Defendants"). We write jointly with counsel for plaintiff Altruis Group, LLC ("Altruis") with respect to the deposition of Defendants' corporate representative.

Defendants initially intended to produce their corporate representative on January 9, 2023—the last day of the fact discovery deadline. Given several factors, including the witness's own schedule and the deposition schedule in this case, which has consisted of six depositions over the past three weeks (a period spanning the end-of-year holidays), Defendants advised Plaintiff that one additional day was needed to sufficiently prepare their corporate representative. Accordingly, bearing in mind Your Honor's prior statements about the parties working together to address discovery issues without resorting to judicial intervention (ECF 48), the parties met and conferred and agreed that Defendants' corporate representative would sit for his deposition on January 10, 2023.

Given the above, the parties respectfully request the Court's permission to take the deposition of Defendants' corporate representative on Tuesday, January 10, 2023, as the parties have worked together to find an amicable resolution to the date for the deposition.

We thank the Court for its consideration.


Respectfully submitted,



Aaron Loterstein

**Granted. SO ORDERED.**

Date: 1/9/2023  
New York, New York

  
Mary Kay Vyskocil  
United States District Judge